

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PETER A. CRAWFORD,

Plaintiff,

v.

Civil Action No.
05-cv-10078 (DPW)

WOLVERINE, PROCTOR & SCHWARTZ, INC.,
STEVEN F. CHILINSKI, and
DEEPAK S. KULKARNI,

Defendants.

**JOINT MOTION TO EXPAND PAGE LIMITS FOR OPPOSITIONS TO SUMMARY
JUDGMENT MOTIONS
AND
JOINT MOTION TO EXTEND FILING DEADLINES**

NOW COMES the Plaintiff and Defendants in the above-captioned action (collectively the “Parties”) and jointly move that this honorable Court, pursuant to Local Rule 7.1(b)(4) grant plaintiff, and defendants collectively, leave to file opposition briefs on the currently pending motions for Summary Judgment of up to forty (40) pages. In support thereof, the Parties state that the issues are complex, that the amount in controversy is approximately \$1.7 million, and that neither party believes that the twenty page limit specified by Local Rule 7.1(b)(4) will be sufficient adequately to present, for the benefit of the Court, the facts and arguments underlying their motions. On March 10, 2006, this Court granted the parties leave to file briefs of up to forty (40) pages in support of their motions for summary judgment.

FURTHERMORE, the parties also come before this Court to jointly and respectfully move for an Order modestly extending the deadline for the parties to respond to each other’s

motions for summary judgment until Monday, April 3, 2006. The parties' oppositions to the pending summary judgment motions are currently due on Friday, March 31, 2006.

FURTHERMORE, the parties also come before this Court to jointly and respectfully move for an Order extending defendants' deadline to answer or otherwise respond to the recently filed Amended Complaint until April 7, 2006.

WHEREFORE, the parties respectfully move that this Court to issue an Order:

- a.) granting the parties leave to file summary judgment opposition briefs of up to forty (40) pages;
- b.) granting the parties an extension of time until April 3, 2006 to file their papers in opposition to the pending summary judgment motions; and
- c.) granting the defendants an extension of time until April 7, 2006 to answer or otherwise respond to plaintiff's Amended Complaint.

Respectfully submitted,

PETER A. CRAWFORD,

WOLVERINE, PROCTOR & SCHWARTZ,
INC.; DEEPAK S. KULKARNI and STEVEN
CHILINSKI,

Plaintiff *Pro Se*

By their attorneys,

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Dated: March 27, 2006